

## REMARKS

Claims 1-20 are pending. Claims 3, 8-15, 18 and 19 have been amended to provide proper antecedent basis and to clarify the wording of various claims. No claims have been added or deleted. No new matter has been added.

### 102(b) Rejections

#### Claims 1-17 and 19-20

Claims 1-17 and 19-20 are rejected under 35 U.S.C. § 102(b) as being anticipated by Vehvilainen (US Patent No.6,504,873 B1). The Applicants have reviewed the cited references and respectfully submit that the present invention as recited in Claims 1-17 and 19-20 is not anticipated by Vehvilainen.

With regard to independent Claim 1, Applicants respectfully disagree with the statement in the instant Office Action to the effect that Vehvilainen teaches "generating a filter identifier based on one of edge parameter ...," as recited in Claim 1.

Applicants understand Vehvilainen to teach a method of filtering based on activities inside of video blocks at the boundary between the video blocks. More specifically, at 3:1-27 Vehvilainen discloses computing a straight line that is perpendicular to the boundary where pixels run along this straight line. Then using a linear equation to compute a numerical value (which shall be referred to as the "computed numerical value" for the sake of illustration) of each of the pixels along the straight line. Filtering is performed on various pixels that run along the straight line to adjust the numerical values of these pixels toward the "computed numerical value."

The rejection states that Claim 1's filter identifier is analogous to Vehvilainen's equation(2) depicted at 9:53-59. However, Vehvilainen states at 9:50-52 that equation(2) is a "condition clause for processing." Further, the rejection states that Vehvilainen's equation(2) is "computed based on one of an edge parameter (e.g., Vehvilainen's "activityEDGE" mentioned at 9:51-53 and 11:53-63)." However, Claim 1 recites an "generating a filter identifier based on one of edge parameter ..." not a condition clause that is computed based on activityEDGE as Vehvilainen discloses. Therefore, Vehvilainen does not teach "generating a filter identifier based on one of edge parameter ...," as recited in Claim 1.

With regard to independent Claim 8, Applicants respectfully disagree with the statement in the instant Office Action to the effect that Vehvilainen teaches "for each input pixel associated with the digital image ... generating a filter identifier based on one of an edge parameter and an activity metric" as recited in Claim 8.

Vehvilainen does not teach "for each input pixel associated with the digital image," as Claim 8 recited. In fact the rejection does not even address this feature of Claim 8.

The rejection states that Claim 8 is rejected on the same basis as Claim 1. As already argued herein, Vehvilainen does not teach or suggest "generating a filter identifier based on one of edge parameter ...," as Claim 8 recites.

Therefore, Applicants respectfully submit that Vehvilainen does not teach nor render obvious Claims 1 and 8. Claims 2-7 are dependent on Claim 1 and Claims 9-14 depend on Claim 8. Further, Claims 2-7 and 9-14 recite

additional limitations. Therefore, Applicants respectfully submit that the basis for rejecting Claims 1-14 under 35 U.S.C. § 102(b) is traversed.

Claim 15 recites “for each input pixel associated with the digital image... determining whether the level of variation is in a predetermined relationship with a predetermined level of variation ... when the predetermined level of variation is not in the predetermined relationship with the predetermined level of variation, generating a measure of an edge parameter ...” The rejection states that Claim 15’s level of variation is analogous to Vehvilainen’s activityIN, that Claim 15’s “predetermined level of variation” is analogous to Vehvilainen’s THRESHOLDin, that Claim 15’s “measure of an edge parameter” is analogous to Vehvilainen’s activityEDGE, and that Claim 15’s “determining whether the level of variation is in a predetermined relationship with a predetermined level of variation” is analogous to Vehvilainen’s equation(2) at 9:53-57.

Referring to Vehvilainen’s equation(2) found at 9:53-59, Vehvilainen generates his activityEDGE (first line of equation(2)) before he even refers to his THRESHOLDin, therefore, Vehvilainen does not teach or suggest “determining whether the level of variation is in a predetermined relationship with a predetermined level of variation ... when a predetermined level of variation is not in a predetermined relationship with the predetermined level of variation, generating a measure of an edge parameter ...”

Claim 15 recites “generating a measure of an edge parameter based on a second window of pixels with reference to the input pixel.” The rejection states “An edge parameter (activityEDGE) is restored based on a second window 57 of figure 5C with reference to the input pixel (Pixel 53 of fig. 5A corresponds

with pixel 34' of figure 3D as the input pixel.)" However, "restoring" is not synonymous with "computing." Therefore, by the rejection's own admission Vehvilainen does not teach or suggest "generating a measure of an edge parameter based on a second window of pixels with reference to the input pixel," as Claim 15 recites.

Therefore, Applicants respectfully submit that Vehvilainen does not teach or render obvious Claim 15. Claims 16, 17, and 19- 20 depend on Claim 15 and recite additional limitations. Therefore, Applicants respectfully submit that the basis for rejecting Claims 15-17 and 19-20 under 35 U.S.C. § 102(b) is traversed.

#### 103(a) Rejections

##### Claim 18

Claim 18 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Vehvilainen in view of Ghaderi (US Patent No.6,504,863 B1). The Applicants have reviewed the cited references and respectfully submit that the present invention as recited in Claim 18 is not anticipated nor rendered obvious by Vehvilainen and Ghaderi, alone or in combination.

Applicants respectfully submit that Ghaderi does not overcome the shortcomings of Vehvilainen. Therefore, Applicants respectfully submit that Vehvilainen and Ghaderi, alone or in combination, do not show nor suggest the present invention as recited in independent Claim 15, and that this claim is considered patentable over Vehvilainen and Ghaderi (alone or in combination). Because Claim 18 depends on Claim 15 and contains additional limitations that are patentably distinguishable over Vehvilainen and Ghaderi (alone or in combination), this claim is also considered patentable over Vehvilainen and

Ghaderi (alone or in combination). Therefore, Applicants respectfully submit that the basis for rejecting Claim 18 under 35 U.S.C. § 103(a) is traversed.

### Conclusions

In light of the above remarks, Applicants respectfully request reconsideration of the rejected claims.

Based on the arguments presented above, Applicants respectfully assert that Claims 1-20 overcome the rejections of record and, therefore, Applicants respectfully solicit allowance of these claims.


Applicants have reviewed the references that the Office Action cited but did not rely upon and respectfully submit that these references neither teach nor suggest the claimed invention.

The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,

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Date: 2/15/04

  
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